

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA, *ex rel.* §
ALEX DOE, Relator, THE STATE OF §
TEXAS, *ex rel.* ALEX DOE, Relator, THE §
STATE OF LOUISIANA, *ex rel.* ALEX DOE, §
Relator, §

Plaintiffs, §

v. §

PLANNED PARENTHOOD FEDERATION §
OF AMERICA, INC., PLANNED §
PARENTHOOD GULF COAST, INC., §
PLANNED PARENTHOOD OF GREATER §
TEXAS, INC., PLANNED PARENTHOOD §
SOUTH TEXAS, INC., PLANNED §
PARENTHOOD CAMERON COUNTY, §
INC., PLANNED PARENTHOOD SAN §
ANTONIO, INC., §

Defendants. §

No. 2:21-cv-022-Z

Date: February 8, 2023

EXHIBIT B

CHART 1 – PPFA DOCUMENTS TO BE UNSEALED IN FULL¹

Appendix Pages	Appendix Document Title²
Appx.002727-2729*	PPFA Accreditation Program Overview
Appx.004016-4017*	PPFA Email to PPST re 2015 PPST Accreditation
Appx.004018-4019*	PPFA Letter to PPST re 2015 PPST Accreditation
Appx.004022-4053	PPFA Consolidated Financial Statements & Supplementary Information dated June 30, 2021 and 2020

¹ This list includes 1 document produced by PPFA that was cited by Plaintiffs but not designated as either Confidential or AEO and 3 documents that PPFA has agreed to downgrade (identified with an asterisk).

² To avoid confusion, PPFA has—where possible, given Plaintiffs’ condensing of multiple documents from the Appendix into a single entry in the Index—used the document titles as written in Plaintiffs’ Index (ECF No. 400). However, PPFA’s use of these titles does not constitute any agreement or concession that Plaintiffs’ descriptions are accurate. Indeed, many of them are not.

CHART 2 – AFFILIATE DEFENDANT DOCUMENTS TO BE UNSEALED IN FULL³

Appendix Pages	Document Title
Appx.000801-0807	PPST Letter to THHSC (Cecile Young) re COVID-19
Appx.000808-0811	Email from Ray to Lambrecht; Linton; Hons re Response to Letters of December 14, 2020
Appx.000866-0872	Final Notice of Termination of Enrollment letter to PPGC; PPGT; PPSA
Appx.001090-1092	Judge Livingston (261 st District Court) Letter re Relators Application for Temporary Mandatory Injunction
Appx.002335-2411	General Information and Administration Provider Manual
Appx.002571-2572*	Letter to PPGC from Bureau of Health Services Financing Provider Enrollment Unit
Appx.002573*	Provider Enrollment letter to PPGC
Appx.002574-2581*	Letter to PPGC
Appx.002671-2677	LA Department of Health letter to Linton re allegations against Planned Parenthood
Appx.002678-2683	LA Department of Health letter to Linton re fetal tissue donation programs
Appx.002684-2695	LA Department of Health letter to Linton re Termination/Revocation of LA Medicaid Provider Agreement
Appx.002696-2697	Gottlieb letter to LeBlanc re Texas Medicaid Program Participation
Appx.002712	Gottlieb letter to Coniglio re Texas Medicaid Program Participation
Appx.002726	Letter to Judge deGravelles re Defendant's Motion to Lift Stay and Vacate Preliminary Injunction
Appx.003354-3355	Binder 5(A) - PPST Accreditation Reports Cover Page & TOC
Appx.004977-4978*	Email from Exnicious to Etheredge fw Thank you for joining 'How Does This Get Paid: An Introduction to PPFA's Medicaid Reimbursement Toolkit'
Appx.005015-5016	Email from Ehrmann re REMINDER: SAVE THE DATE: Medicaid Auditing and Compliance Webinar
Appx.005025-5028*	Email from McKinney to DeJong fw Upcoming Webinar on New Medicaid Managed Care Rule
Appx.005032-5034*	Email from Lambrecht to McKinney; DeJong et al fw Gap Funding Approach & Additional Contingency Planning Details
Appx.005035-5036	Email from Singiser to Lambrecht re Title X and Medicaid Follow-Up Questions
Appx.005141-5146*	Email from Lambrecht to McKinney; Wheat; Sannes fw Previous Ltr of Interest for AEC SC and Governance

³ This list includes 17 documents produced by Affiliate Defendants that were cited by Plaintiffs but not designated as either Confidential or AEO and 10 documents that Affiliate Defendants have agreed to downgrade (identified with an asterisk).

Appendix Pages	Document Title
Appx.005194-5195	Email from Ayers to Affiliate CEOS, COOs, Chief Execs, CFOs, General Counsels re Flagging 340BESP Terms of Use
Appx.005212-5213*	Email from Brooks to Cowhard; Affiliate Chief Execs re ARMs insurance payment
Appx.006148	Email from Lambrecht to McKinney re Medicaid administrative hearing
Appx.006160-6172*	Email from McKinney to Lambrecht re President Biden Takes Action on Sexual and Reproductive Health
Appx.006179-6277	Original Petition for Writ of Mandamus, Application for Temporary Restraining Order, Temporary Mandatory Injunction, and Permanent Mandatory Injunction
Appx.006295*	Email from Hons to Barraza re the recent Medicaid ruling - Planned Parenthood South Texas

CHART 3 – PPFA DOCUMENTS TO BE UNSEALED IN PART

Appendix Pages	Appendix Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
Appx.001430-1488	30(b)(6) Deposition Transcript of Vickie Barrow-Klein (PPFA)	Transcript pages: 24:13-18 32:16-20 38:4-19 75:16-76:11 93:7-94:8 147:11-150:10 151:5-17 198:2-200:5 200:6-201:12 208:8-22	All other pages and lines	All other pages are not cited; the transcript contains Confidential and AEO information, including especially sensitive financial information and commercial information that is not publicly known.
Appx.001539-1571	Deposition Transcript of Rosemary Coluccio	Transcript pages: 12:6-21 14:23-18:15 18:18-23:2	All other pages and lines	All other pages are not cited; the transcript contains Confidential and AEO information, including especially sensitive financial information and commercial information that is not publicly known.
Appx.001638-1703	30(b)(6) Deposition Transcript of Kim Custer (PPFA)	Transcript pages: 29:7-30:2 72:8-22 148:23-149:7 151:1-7 168:16-23 179:24-182:1 183:1-7 188:6-10 191:5-16 203:8-17	All other pages and lines	All other pages are not cited; the transcript contains Confidential and AEO information, including especially sensitive financial information and commercial information that is not publicly known.

Appendix Pages	Appendix Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
		238:16-239:14 246:3-22 252:8-254:10 255:8-15		
Appx.001742-1802	Deposition Transcript of Louis Dudney	Transcript pages: 199:8-201:7	All other pages and lines	All other pages are not cited; the transcript contains Confidential and AEO information, including especially sensitive financial information and commercial information that is not publicly known.
Appx.001840-1894	Deposition Transcript of Tamara Kramer	Transcript pages: 161:19-23 169:21-172:19 173:5-174:12 182:17-183:17	All other pages and lines	All other pages are not cited; the transcript contains Confidential and AEO information, including especially sensitive financial information and commercial information that is not publicly known.
Appx.002202-2253	Deposition Transcript of Teri Trivisonno	Transcript pages: 81:18-82:13 82:23-83:19 85:1-91:14 92:13-96:8 96:24-98:3 98:18-100:1 100:6-101:6 101:11-102:4 103:1-105:2 150:10-151:5 151:9-13 151:23-25 152:1-10	All other pages and lines	All other pages are not cited; the transcript contains Confidential and AEO information, including especially sensitive financial information and commercial information that is not publicly known.

Appendix Pages	Appendix Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
		153:16-155:9 155:19-25 156:1-11 157:5-13 157:19-25 158:1-161:5 161:17-20 172:5-21 174:20-176:18 176:24-177:3 177:7-12 177:17-20 178:21-180:21 181:9-11 181:13-184:20 185:9-11 187:7-25 189:9-190:23 192:10-193:14 193:18-24 194:3-6 195:4-12 195:23-25 196:1-4 196:17-197:4 197:9-12 197:23-25 198:1-4 198:12-14		
Appx.004011-4012	PPFA Email and Letter re PPST conditional accreditation	4012	4011	IRRELEVANT PERSONAL INFORMATION

Appendix Pages	Appendix Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
	status of PPST ancillary organizations			Contains personal cell phone contact information.
Appx.004013	PPFA Email re approval of PPGC/PPGT/PPST shared ancillary organization Planned Parenthood Advocates of Texas	N/A	4013	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.004014-4015	PPFA Email re review of PPGC/PPGT/PPST shared ancillary organizations Planned Parenthood Advocates of Texas and Planned Parenthood Texas Votes	4014	4015	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.004020-4021	PPFA Email from PPST re 2020 PPST Mid-Cycle Self-Assessment	4020	4021	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.005029-5031	Email from PPFA to Affiliate CEOs re: Monthly CEO Policy Call, topic PP defund and HHS review of 1115 waivers	N/A	5029-5031	IRRELEVANT PERSONAL INFORMATION Contains non-party contact information.
Appx.005083-5121	Putting Women's Health Care on the Map: A Report on Year 3 of the Health Care Investment Program	5094-5096	5083-5093, 5097-5121	IRRELEVANT CONFIDENTIAL INFORMATION Especially sensitive financial information; commercial information that is not publicly known.

Appendix Pages	Appendix Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
				Only three pages of this document are cited to support the following proposition: “One of the main goals of the HCIP was to maximize Medicaid revenue for the Affiliates.” ECF No. 391 at 85.
Appx.005147-5149	Email re: M. DeJong, PPGT CFO service on PPFA Fiduciary Committee Meeting	5149	5147-5148	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.005159-5162	PPFA Email re: pressure on LA Governor re: PPGC Medicaid status; dated Jan. 7, 2021	5160, 5162	5159, 5161	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.005186-5187	PPFA Email to Affiliate CEOs re: Service Expansion Grant Awards to Affiliates from PPFA Healthcare Operations Team	5186	5187	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.006126-6128	Email from PPFA’s R. Clawson to T. Trivisonno re: referring Texas Medicaid patients to PP competitors; dated Jan. 25, 2021	6127	6126, 6128	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.006149-6155	PPFA emails re: press conference on TX Medicaid decision from Fifth Circuit; dated Dec. 16, 2020	6149-6151	6152-6155	IRRELEVANT PERSONAL INFORMATION

Appendix Pages	Appendix Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
				Contains personal cell phone contact information; contains names of non-public employees.
Appx.006156-6159	PPFA Email to Natl Exec Team re: strategy and goals after Texas affiliates terminated from Medicaid, dated Feb. 2, 2021	6156-6157, 6159	6158	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.006278-6292	PPFA Email to CEO Cecile Richards re: Briefing for Press Call Tomorrow regarding Texas Medicaid lawsuit with Attachment; dated Nov. 22, 2015	6280-6292	6278-6279	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.
Appx.006293-6294	PPFA Email re: PPFA and TX Affiliates working with media to successfully pressure Texas Governor to give a “grace period” to buy time to see patients, dated Jan. 6, 2021	6294	6293	IRRELEVANT PERSONAL INFORMATION Contains personal cell phone contact information.

CHART 4 – AFFILIATE DEFENDANT DOCUMENTS TO BE UNSEALED IN PART

Appendix Pages	Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
Appx.001309-1377	Polin Barraza Deposition Transcript (Day 1)	Transcript pages: 25; 29; 184; 219–221	All other pages	The remaining pages were not cited in the brief. In addition, uncited pages include non-party names; trade secret and proprietary information, including detailed accreditation information; and grant and financial information.
Appx.001378-1429	Polin Barraza Deposition Transcript (Day 2)	Transcript pages: 306; 465–466	All other pages	The remaining pages were not cited in the brief. In addition, uncited pages include non-publicly identified employee names; trade secret and proprietary information, including detailed accreditation information; and grant and financial information.
Appx.001572-1637	PPGC 30b6 Deposition Transcript (Curtis)	Transcript pages: 21-24; 32-35; 121; 210-212; 219-220; 237-238	All other pages	The remaining pages were not cited in the brief. In addition, uncited pages include non-publicly identified employee names; trade secret and proprietary information, including detailed accreditation information; and grant and financial information.
Appx.001895-1950	Ken Lambrecht Deposition Transcript (December 6, 2022)	Transcript pages: 26-29; 31; 40; 46;140	72-73; all other pages	Pages 72-73 are designated as Confidential because they discuss grant and financial information. The remaining pages were not cited in the brief. In addition, uncited pages include trade secret and proprietary information, including detailed accreditation information; and grant and financial information.
Appx.001951-2020	Ken Lambrecht Deposition Transcript (November 21, 2022)	Transcript pages: 25; 134; 141; 190-191; 244-245	All other pages	The remaining pages were not cited in the brief. In addition, uncited pages include trade secret and proprietary information, including

Appendix Pages	Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
				detailed accreditation information; and grant and financial information.
Appx.002021-2089	Melaney Linton Deposition Transcript	Transcript pages: 67-68; 115-116; 123; 190-191	All other pages	The remaining pages were not cited in the brief. In addition, uncited pages include non-publicly identified employee names; trade secret and proprietary information, including detailed accreditation information; and grant and financial information.
Appx.002706-2708	Email from Dixon to PPGC-PC-Patient Access Center fw Read me - Texas Medicaid Update	N/A	All non-public employee names ⁴	IRRELEVANT NON-PUBLIC PERSONAL INFORMATION Document contains non-public names and contact information.
Appx.005196-5197	Email from Hitson to Affiliate Clinicians; IT; Quality Risk Management re Webinar Reminder: HER Guidelines: Referrals, HIPAA Omnibus Rule, & Granting Access in the EHR	N/A	All non-public PP employee names	IRRELEVANT NON-PUBLIC PERSONAL INFORMATION Document contains non-public names and contact information.
Appx.005675-6029	Affiliate Defendants' Third Privilege Log	N/A	All non-public PP employee names	IRRELEVANT NON-PUBLIC PERSONAL INFORMATION Document contains non-public names and contact information.
Appx.006030-6121	Affiliate Defendants' First Privilege Log	N/A	All non-public PP employee names	IRRELEVANT NON-PUBLIC PERSONAL INFORMATION

⁴ Affiliate Defendants are happy to provide chambers with a list of all the non-public facing employees redacted for *in camera* review.

Appendix Pages	Document Title	Pages to Unseal	Seal / Redact	Reasons for Sealing
				Document contains non-public names and contact information.

CHART 5 – PPFA DOCUMENTS THAT SHOULD REMAIN SEALED

Appendix Pages	Appendix Document Title	Reason for Sealing
Appx.002730-2740	PPFA Accreditation & Evaluation Department Accreditation Introductory Call Overview, Script & Communications Template	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “PPFA requires the Affiliate Defendants to be ‘accredited’ through a rigorous appraisal of their policies, practices, and programs to assess compliance with PPFA’s standards.” ECF No. 391 at 77-78; <i>id.</i> at 11 (similar).
Appx.002741-2776	PPFA 2015 Accreditation Indicators and Elements of Performance	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “PPFA requires the Affiliate Defendants to be ‘accredited’ through a rigorous appraisal of their policies, practices, and programs to assess compliance with PPFA’s standards.” ECF No. 391 at 77-78; <i>id.</i> at 11 (similar).
Appx.002777-2827	PPFA 2017 Accreditation Indicators and Elements of Performance	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “PPFA requires the Affiliate Defendants to be ‘accredited’ through a rigorous appraisal of their policies, practices, and programs to assess compliance with PPFA’s standards.” ECF No. 391 at 77-78; <i>id.</i> at 11 (similar).
Appx.002828-2878	PPFA 2018 Accreditation Indicators and Elements of Performance	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “PPFA requires the Affiliate Defendants to be ‘accredited’ through a rigorous appraisal of their policies, practices, and programs to assess compliance with PPFA’s standards.” ECF No. 391 at 77-78; <i>id.</i> at 11 (similar).

Appendix Pages	Appendix Document Title	Reason for Sealing
Appx.002879-3027	PPFA 2022 Accreditation & Evaluation Department Accreditation Form/Template	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “PPFA requires the Affiliate Defendants to be ‘accredited’ through a rigorous appraisal of their policies, practices, and programs to assess compliance with PPFA’s standards.” ECF No. 391 at 77-78; <i>id.</i> at 11 (similar).
Appx.003028-3111	PPFA 2017 PPGC Accreditation Report	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “PPFA requires the Affiliate Defendants to be ‘accredited’ through a rigorous appraisal of their policies, practices, and programs to assess compliance with PPFA’s standards.” ECF No. 391 at 77-78; <i>id.</i> at 11 (similar).
Appx.003112-3151	PPFA 2019 PPGT Accreditation Report	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “PPFA requires the Affiliate Defendants to be ‘accredited’ through a rigorous appraisal of their policies, practices, and programs to assess compliance with PPFA’s standards.” ECF No. 391 at 77-78; <i>id.</i> at 11 (similar).
Appx.003152-3210	PPFA 2015 PPGT Accreditation Report	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).
Appx.003211-3289	PPFA 2012 PPGC Accreditation Report	TRADE SECRET Sensitive trade secret information.

Appendix Pages	Appendix Document Title	Reason for Sealing
		Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).
Appx.003290-3353	PPFA 2021 PPGC Accreditation Report	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).
Appx.003447-3545	PPFA 2016 PPST Accreditation Report	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).
Appx.003583-3603	PPFA 2019 PPST Accreditation Overview Presentation/Slides and Summary of Corrective Actions	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).
Appx.003604-3661	PPFA 2019 PPST Accreditation Report	TRADE SECRET Sensitive trade secret information. Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).
Appx.003662-3737	PPFA 2012 PPST Accreditation Report	TRADE SECRET Sensitive trade secret information.

Appendix Pages	Appendix Document Title	Reason for Sealing
		Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).
Appx.003738-3792	PPFA 2019 PPST Accreditation Report	<p>TRADE SECRET</p> <p>Sensitive trade secret information.</p> <p>Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).</p>
Appx.003970-4010	PPFA 2019 PPGT Accreditation Report	<p>TRADE SECRET</p> <p>Sensitive trade secret information.</p> <p>Cited to support the proposition that: “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78; <i>id.</i> at 11 (similar).</p>
Appx.004390-4546	PPFA Health Care Investment Program Year 1-4 Reports	<p>IRRELEVANT CONFIDENTIAL INFORMATION</p> <p>Especially sensitive financial and marketing information, including detailed information about non-parties.</p> <p>Cited exclusively to support the proposition that: “PPFA also created and funded a program called the Health Care Investment Program (HCIP) to provide technical assistance to PPFA Affiliates on issues such as Medicaid.” ECF No. 391 at 85.</p>
Appx.004547-4570	PPFA Health Care Investment Program Year 1-4 Reports (Cont.)	<p>IRRELEVANT CONFIDENTIAL INFORMATION</p> <p>Especially sensitive financial and marketing information, including detailed information about non-parties.</p> <p>Cited exclusively to support the proposition that: “PPFA also created and funded a program called the Health Care Investment Program (HCIP) to provide technical assistance to PPFA Affiliates on issues such as Medicaid.” ECF No. 391 at 85.</p>

Appendix Pages	Appendix Document Title	Reason for Sealing
Appx.004571-4859	30(b)(6) Deposition of Vickie Barrow Klein: PPFA Transaction Ledger and PPFA Financial Documents	<p>IRRELEVANT CONFIDENTIAL INFORMATION</p> <p>Especially sensitive financial information, including detailed financial information about non-parties.</p> <p>Pages 4572-4821 are cited exclusively to support the proposition that: “There are thousands of financial transactions between the Affiliates and PPFA each year.” ECF No. 391 at 10.</p> <p>Note: Appx.004822-4859 is a separate document; it is uncited.</p>
Appx.004863-4887	Email from K. Custer to Affiliate CEOs; Subject: Information Request for NPS Motion; dated Mar. 10, 2015; attachments: Highlights from PPFA Program Support for Affiliates; PPFA National Office Services to Affiliates; NPS and Financial Comparison for Affiliates; Health Care Business Model Project	<p>IRRELEVANT CONFIDENTIAL INFORMATION</p> <p>Especially sensitive financial information; commercial information that is not publicly known.</p>
Appx.004977-5009	Email from R. Exnicious re: Introduction to PPFA’s Medicaid Reimbursement Toolkit; dated Oct. 28, 2019; attachment: Medicaid Reimbursement Toolkit	<p>TRADE SECRET</p> <p>Especially sensitive trade secret information; commercial information that is not publicly known.</p> <p>Cited exclusively to support the propositions that: “The Healthcare Division also has a Business Operations Team which assists Affiliates with their revenue cycle, among other things, which includes Medicaid billing” and “PPFA’s HCIP Team publishes a ‘Medicaid Toolkit’ that advises best practices on billing.” ECF No. 391 at 9, 85.</p>
Appx.005037-5055	Planned Parenthood Revenue Cycle Toolkit	<p>TRADE SECRET</p>

Appendix Pages	Appendix Document Title	Reason for Sealing
		<p>Especially sensitive trade secret information; commercial information that is not publicly known.</p> <p>Cited exclusively to support the proposition that: “The Healthcare Division also has a Business Operations Team which assists Affiliates with their revenue cycle, among other things, which includes Medicaid billing.” ECF No. 391 at 9.</p>
Appx.005066-5071	PPFA Email re: NPS Dues Forgiveness	<p>IRRELEVANT CONFIDENTIAL INFORMATION</p> <p>Especially sensitive financial information; commercial information that is not publicly known.</p>
Appx.005155-5158	PPFA Email re: New Clinic Budget Sheet	<p>IRRELEVANT CONFIDENTIAL INFORMATION</p> <p>Especially sensitive financial information; commercial information that is not publicly known; also contains personal cell phone contact information.</p> <p>Cited exclusively to support the proposition that: “PPFA receives donations from outside funders to pay for the construction of new PPFA healthcare facilities, conducts financial analysis and market research for new potential PPFA healthcare facilities, and performs extensive design and construction review of nearly every detail of proposed PPFA healthcare facilities.” ECF No. 391 at 82-83.</p>
Appx.005214-5219	Updated from ARMS dated Mar. 2016 re: portraying Planned Parenthood as excellent and stable amid media scrutiny	<p>IRRELEVANT CONFIDENTIAL INFORMATION</p> <p>Sensitive marketing information.</p> <p>Cited exclusively to support the proposition that: “To be a PPFA Affiliate, Affiliates must also be insured by Affiliate Risk Management Services (ARMS), a company that only insures PPFA entities and affiliates. . . . ARMS’ sole member, Policyholders’ Trust, is a PPFA-related company and is controlled by PPFA Affiliate CEOs and PPFA directors ‘to ensure that the organization will always support’ PPFA and the PPFA Affiliates.” ECF No. 391 at 10.</p>

CHART 6 – AFFILIATE DEFENDANT DOCUMENTS THAT SHOULD REMAIN SEALED

Appendix Pages	Document Title	Reason for Sealing
Appx.003356-3446	Final PPST Affiliate Accreditation Report (Binder 5(A) Tab 500)	<p>TRADE SECRET AND SENSITIVE NON-PUBLIC SECURITY INFORMATION</p> <p>Document is a detailed accreditation report, including sensitive security information.</p> <p>Cited in 1300 page string cite to support the proposition that “The PPFA Affiliate Defendants are all Planned Parenthood entities and members of PPFA, so they are all required to go through PPFA’s accreditation process in order to retain those privileges.” ECF No. 391 at 11.</p> <p>Cited in 900 page string cite to support the proposition that “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78.</p>
Appx.003546-3582	PPST Corrective Action Report (Binder 5(A) Tab 506)	<p>TRADE SECRET AND SENSITIVE NON-PUBLIC SECURITY INFORMATION</p> <p>Document is a detailed accreditation report, including sensitive security information.</p> <p>Cited in 1300 page string cite to support the proposition that “The PPFA Affiliate Defendants are all Planned Parenthood entities and members of PPFA, so they are all required to go through PPFA’s accreditation process in order to retain those privileges.” ECF No. 391 at 11.</p> <p>Cited in 900 page string cite to support the proposition that “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78.</p>
Appx.003793-3871	Email from Lambrecht to Olson fw Final accreditation report for Planned Parenthood of Greater Texas	<p>TRADE SECRET AND SENSITIVE NON-PUBLIC SECURITY INFORMATION</p> <p>Document is a detailed accreditation report, including sensitive security information.</p>

Appendix Pages	Document Title	Reason for Sealing
		<p>Cited in 1300 page string cite to support the proposition that “The PPFA Affiliate Defendants are all Planned Parenthood entities and members of PPFA, so they are all required to go through PPFA’s accreditation process in order to retain those privileges.” ECF No. 391 at 11.</p> <p>Cited in 900 page string cite to support the proposition that “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78.</p>
Appx.003872-3884	Email from White to PPFA re accreditation corrective action plan	<p>TRADE SECRET AND SENSITIVE NON-PUBLIC SECURITY INFORMATION</p> <p>Document is a detailed accreditation report, including sensitive security information.</p> <p>Cited in 1300 page string cite to support the proposition that “The PPFA Affiliate Defendants are all Planned Parenthood entities and members of PPFA, so they are all required to go through PPFA’s accreditation process in order to retain those privileges.” ECF No. 391 at 11.</p> <p>Cited in 900 page string cite to support the proposition that “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78.</p>
Appx.003885-3903	Email from Johnson to Lambrecht; Frances attaching PPGT Draft Summary Outcome Presentation	<p>TRADE SECRET AND SENSITIVE NON-PUBLIC SECURITY INFORMATION</p> <p>Document is a detailed accreditation report, including sensitive security information.</p> <p>Cited in 1300 page string cite to support the proposition that “The PPFA Affiliate Defendants are all Planned Parenthood entities and members of PPFA, so they are all required to go through PPFA’s accreditation process in order to retain those privileges.” ECF No. 391 at 11.</p> <p>Cited in 900 page string cite to support the proposition that “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78.</p>

Appendix Pages	Document Title	Reason for Sealing
Appx.003904-3928	Email from White to Lambrecht et al re Accreditation Resources	<p>TRADE SECRET AND SENSITIVE NON-PUBLIC SECURITY INFORMATION</p> <p>Document is a detailed accreditation report, including sensitive security information.</p> <p>Cited in 1300 page string cite to support the proposition that “The PPFA Affiliate Defendants are all Planned Parenthood entities and members of PPFA, so they are all required to go through PPFA’s accreditation process in order to retain those privileges.” ECF No. 391 at 11.</p> <p>Cited in 900 page string cite to support the proposition that “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78.</p>
Appx.003929-3969	PPFA Accreditation and Evaluation Department - Guide for Accreditation Reviews	<p>TRADE SECRET AND SENSITIVE NON-PUBLIC SECURITY INFORMATION</p> <p>Document is a detailed accreditation report, including sensitive security information.</p> <p>Cited in 1300 page string cite to support the proposition that “The PPFA Affiliate Defendants are all Planned Parenthood entities and members of PPFA, so they are all required to go through PPFA’s accreditation process in order to retain those privileges.” ECF No. 391 at 11.</p> <p>Cited in 900 page string cite to support the proposition that “Since 2015, PPFA has completed several comprehensive accreditation reviews of each of the Affiliate Defendants.” ECF No. 391 at 78.</p>
Appx.005188-5189	Email from Trivisonno re New PPFA Building Book for Health Centers	<p>SENSITIVE NON-PUBLIC SECURITY INFORMATION</p> <p>Document contains sensitive security information.</p> <p>Cited exclusively to support the proposition that “Since 2014, PPFA has published and distributed a book called the “PPFA Building Book for Health Centers” providing comprehensive design and construction information, potential floor plans for different kinds of PPFA health</p>

Appendix Pages	Document Title	Reason for Sealing
		centers, color schemes, and other design considerations involved in constructing new PPFA healthcare facilities.” ECF No. 391 at 83.
Appx.005190-5193	Email from Sueyoshi to Affil COOs; Affil-PSDs; Affil Chief Execs; Affil CAPS AB; Affil Medical Directors re Direct to Patient Medication Abortion Mail Order Pharmacy Information	<p>SENSITIVE NON-PARTY INFORMATION</p> <p>Document contains non-party commercial information. Cited exclusively to support the proposition that “PPFA has recently explored options for mail order pharmacies to provide direct-to-patient medication abortion to PPFA’s patients.” ECF No. 391 at 83.</p>
Appx.006142-6145	Email from McKinney to Sannes re 5 th Circuit Ruling re Planned Parenthood in Medicaid	<p>SENSITIVE RECENT FINANCIAL INFORMATION</p> <p>Document contains financial and grant information. Cited exclusively to support the proposition that “PPGT is working with Planned Parenthood Federation of America (PPFA) legal counsel regarding next steps in the courts and with the new administration in early 2021.” ECF No. 391 at 71.</p>

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2023, a copy of the foregoing was served pursuant to the Court's ECF system.

/s/ Danny S. Ashby
Danny S. Ashby